

PROPER DRUG DISPOSAL FOR LONG TERM CARE FACILITIES



August 5, 2013

Sabin-Cleere Room

Colorado Department of Public Health & Environment

4300 Cherry Creek Drive

Denver, CO 80246



Colorado Department
of Public Health
and Environment

INTRODUCTION



Colorado Department
of Public Health
and Environment

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QUESTIONS FOR TODAY



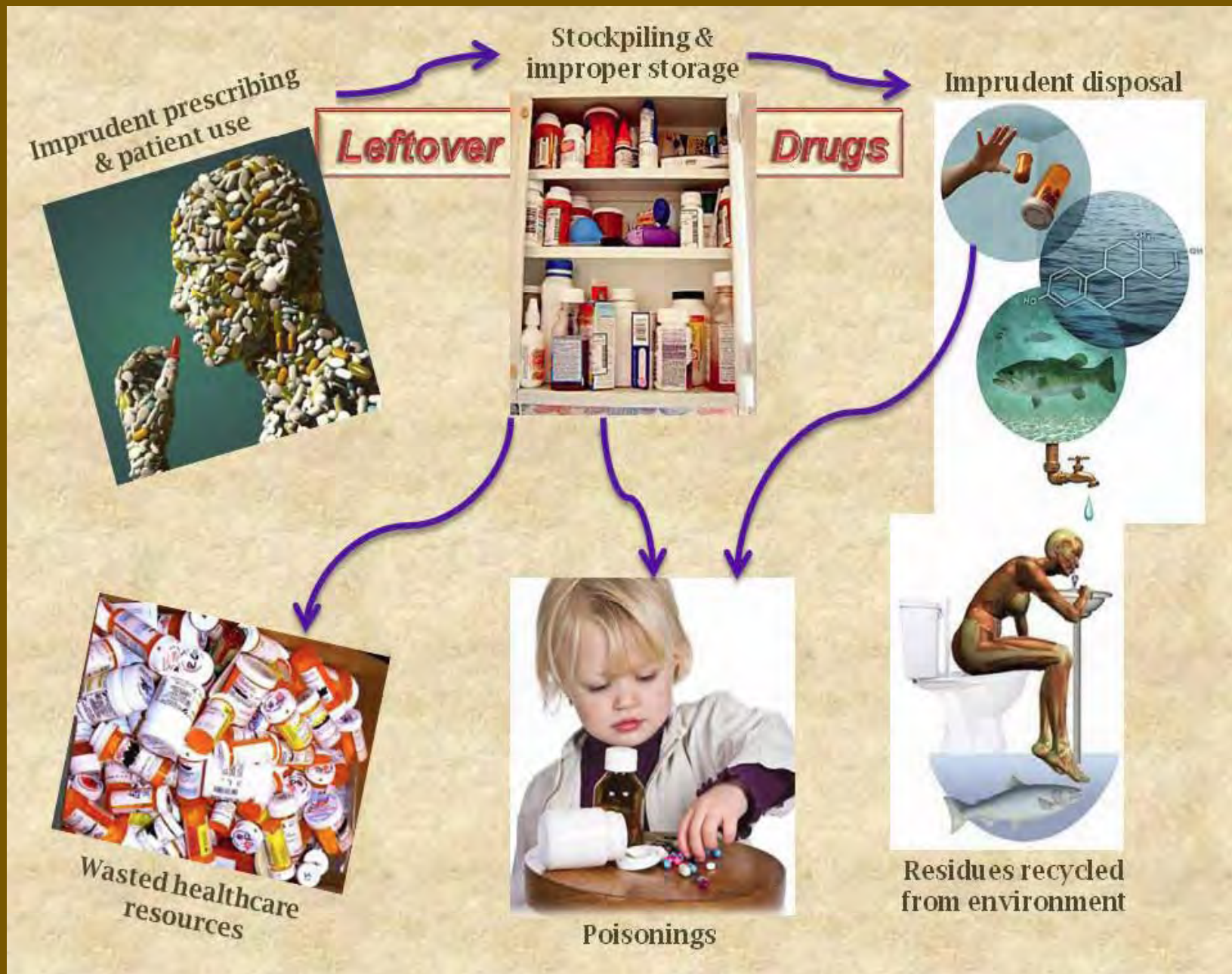
- Why do we care?
- Where do these requirements come from?
- What is RCRA and how does it affect my facility?
- What do the medical waste regulations require?
- How do I comply?

PHARMACEUTICALS IN THE ENVIRONMENT

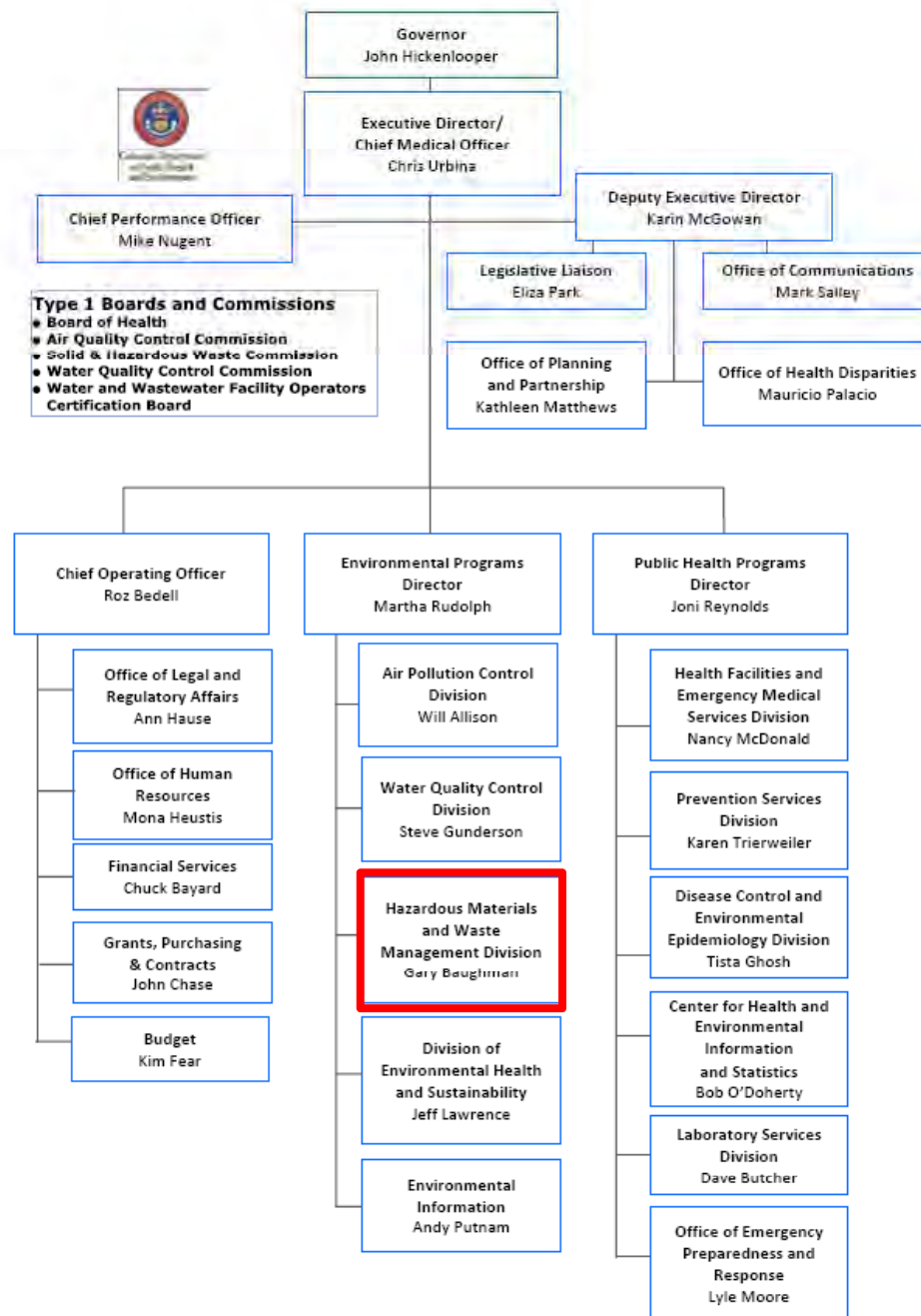


- USGS found pharmaceuticals, hormones and other organic pollutants in 139 streams in 30 states in *1999/2000
- Improper disposal of pharmaceutical waste is one potential source

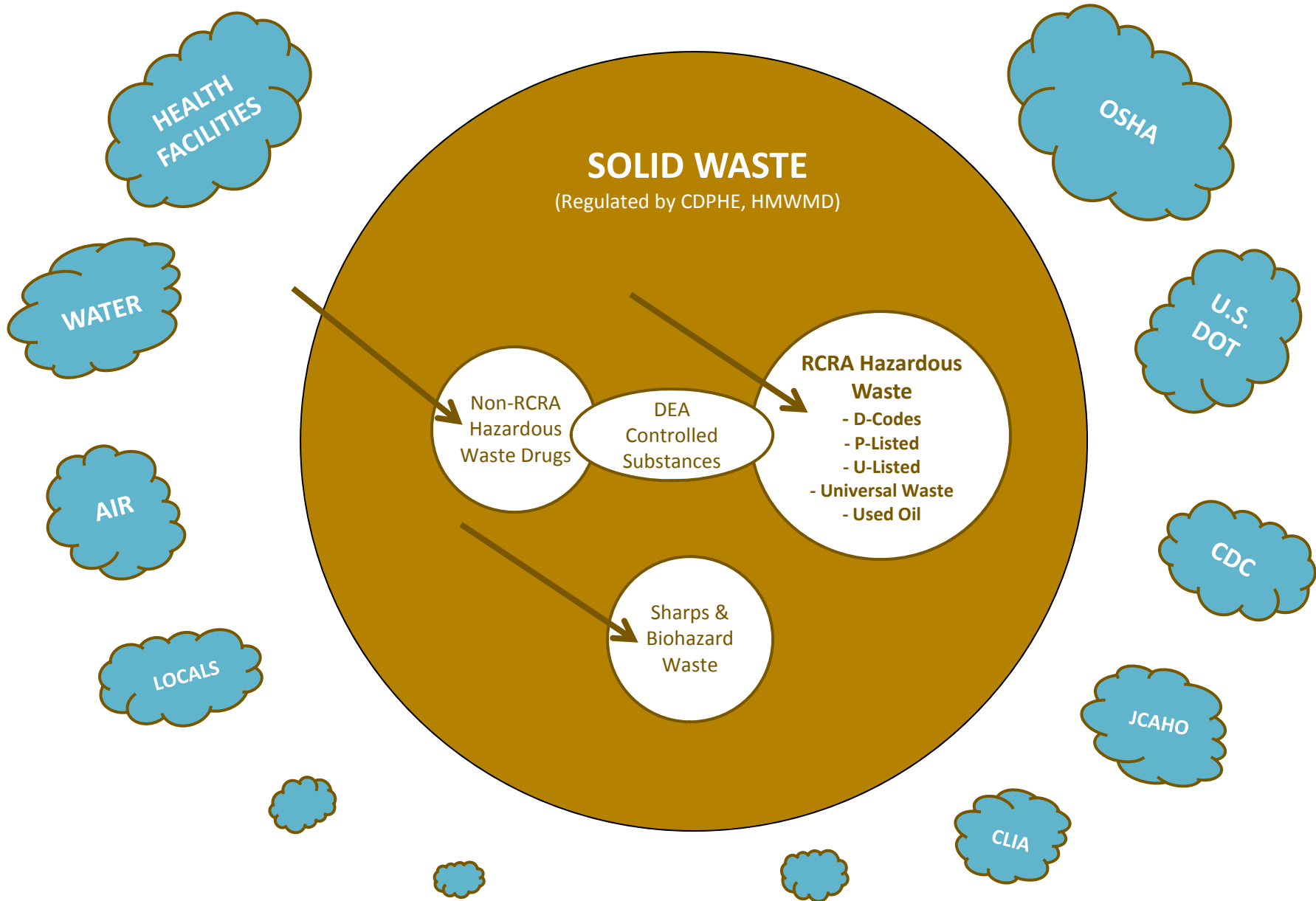
*Source: USGS Open-File Report 02-94



Source: Daughton CG "Drugs and the Environment: Stewardship & Sustainability," National Exposure Research Laboratory, Environmental Sciences Division, US EPA, Las Vegas, Nevada, report NERL-LV-ESD 10/081, EPA/600/R-10/106, 12 September 2010, 196 pg; available: <http://www.epa.gov/nerlesd1/bios/daughton/APM200-2010.pdf>



LTCF WASTE UNIVERSE



WHAT IS RCRA AND WHY DOES IT MATTER?

- ❑ **Resource Conservation and Recovery Act** regulates hazardous waste
- ❑ Federally-based program delegated to CDPHE
- ❑ Contains strict definitions of hazardous waste; different from OSHA, NIOSH, etc.
- ❑ RCRA hazardous waste pharmaceuticals generally require incineration at RCRA incinerator (only 10 nationwide; none in Colorado)
- ❑ Non-RCRA pharmaceutical waste is regulated too, but not as strictly

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY
OR THE CALIFORNIA DEPARTMENT OF HEALTH SERVICES

GENERATOR INFORMATION

NAME _____

ADDRESS _____ PHONE _____

CITY _____ STATE _____ ZIP _____

EPA ID NO. / MANIFEST DOCUMENT NO. _____

EPA CA ACCUMULATION

WASTE NO. _____ WASTE NO. _____ START DATE _____

CONTENTS COMPOSITION

PHYSICAL STATE HAZARDOUS PROPERTIES ☐ FLAMMABLE ☐ TOXIC
☐ SOLID ☐ LIQUID ☐ CORROSIVE ☐ REACTIVITY ☐ OTHER _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

STYLE WWCAS

RCRA HAZARDOUS WASTE REQUIREMENTS & LTCFs

- ❑ RCRA hazardous waste and non-RCRA waste rules fully apply to LTCFs
- ❑ RCRA hazardous waste penalty maximum is \$25,000 per day, per violation
- ❑ Proper disposal helps manage risk to LTCF, employees, contractors and environment



SOME RCRA HAZARDOUS PHARMACEUTICALS



Exceeds TCLP for Ag



Exceeds TCLP for m-cresol



Ignitable Hazardous Waste
(flashpoint < 140° F)



Acutely-hazardous P-listed
wastes



P-LISTED HAZARDOUS WASTES



- 2.2 lbs. or more of acute (P-listed) hazardous waste = LQG
- Empty containers that held P-listed drugs are hazardous wastes
- If you triple-rinse the containers, the rinsate must be managed as a hazardous waste

WHERE NOT TO DISPOSE



Note: Currently, most Colorado landfills cannot accept non-RCRA hazardous waste pharmaceuticals from businesses. None can accept RCRA hazardous pharmaceuticals.

COMMON VIOLATION FOR LTCF_s PHARMACEUTICALS IN SHARPS CONTAINERS



WHY ARE SHARPS CONTAINERS NOT SUITABLE FOR PHARMACEUTICAL WASTE?

AUTOCLAVE



MUNICIPAL LANDFILL



Waste water discharge from some autoclave units and from washing equipment for red bag and sharps containers.

WHERE CAN PHARMACEUTICAL WASTE BE DISPOSED?

- ❑ RCRA hazardous pharmaceutical wastes must go to a RCRA-permitted hazardous waste incinerator
- ❑ Non-RCRA hazardous pharmaceutical wastes may go to municipal or medical waste incinerators, an approved landfill or a few other types of facilities; generally cannot go in the trash



WHAT ABOUT CONTROLLED SUBSTANCES?



- RCRA hazardous waste and solid waste requirements defer to DEA requirements and other efforts to prevent diversion

MORE RCRA HAZARDOUS WASTE = MORE REQUIREMENTS



- **Conditionally Exempt Small Quantity Generators (CESQGs)** of RCRA hazardous waste have the fewest requirements
- **Small Quantity Generators (SQGs)** and **Large Quantity Generators (LQGs)** have more requirements

THE 5 CESQG REQUIREMENTS



1. Determine what RCRA hazardous wastes you generate
2. Stay below the volume thresholds
3. Send waste to a disposal facility that is authorized to accept RCRA hazardous wastes from CESQGs
4. Minimize releases
5. Self-certify by September 30, 2013

CESQG REQUIREMENT #1

1. Determine what RCRA hazardous wastes you generate



How?

- ❑ Compile an inventory and ask your disposal company, pharmacist or a consultant for help OR
- ❑ Subscribe to a commercial service OR
- ❑ Devise another accurate way to make hazardous waste determinations

CESQG REQUIREMENT #2



2. Stay below the volume thresholds

- ▣ 220 lbs. hazardous non-acute hazardous waste per month
- ▣ < 2,200 lbs. non-acute hazardous waste at any one time
- ▣ < 2.2 lbs. acute hazardous waste generated or accumulated per month

How?

- ▣ Weigh your waste monthly and document the weights OR
- ▣ Add up the weights on your disposal log OR
- ▣ Devise another accurate way

CESQG REQUIREMENT #3

3. Send waste to a disposal facility that is authorized to accept RCRA hazardous wastes from CESQGs



How?

- Ask your disposal company for documentation that they can accept RCRA hazardous waste from CESQGs
- The verification should include the name, address, EPA ID # and type of RCRA permit held by the facility that accepts the waste

CESQG REQUIREMENT #4

4. Minimize releases



*Shredded waste should not be left open to the environment!

How?

- Make sure waste is properly containerized at all times
- If you are shredding waste, use a unit that effectively contains dust or discontinue shredding

CESQG REQUIREMENT #5

5. Self-certify by September 30, 2013

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG) NURSING HOME AND INSTITUTIONAL HOSPICE 2013 HAZARDOUS WASTE COMPLIANCE SELF-CERTIFICATION CHECKLIST			
A. General <i>For more information, go to the Guidance Document Link to Section 4</i>	YES	NO	N/A
1. Has your facility determined which wastes generated at your facility are hazardous wastes and which wastes are not hazardous wastes?			
2. Does your facility dispose of all hazardous waste through a permitted treatment, storage and disposal facility? Write in the name, address, and EPA ID number for the final disposal facility that receives your facility's RCRA hazardous waste pharmaceuticals: Name: Address: EPA ID#:			
3. Does your facility dispose of all <u>non-hazardous</u> pharmaceutical waste at a facility that is approved for the type of waste (not in the drain, sharps container, or trash unless specifically approved)? Write in the name, address, and EPA ID number for the final disposal facility that receives your facility's <u>non hazardous</u> waste pharmaceuticals: Name: Address:			
4. Does your facility ensure that no hazardous waste is disposed of on the ground, or to a sanitary sewer, storm drain, bodies of water, in the sharps or red bag waste containers, or in the trash?			
5. Do you manage your fluorescent lights, batteries, computers, aerosol cans and mercury containing devices as hazardous waste or universal waste instead of throwing them into the trash?			
6. Does your facility always generate less than 220 pounds of non-acute hazardous waste per calendar month? (Do not include universal waste.)			
7. Does your facility always have less than 2200 pounds of non-acute hazardous waste onsite at any one time? (Do not include universal waste.)			
8. Does your facility generate less than 2.2 pounds of acute hazardous waste (for example, warfarin or nicotine) per month or accumulate less than 2.2 pounds onsite at any one time?			
9. Is the facility operated in a manner that minimizes the potential for releases of hazardous waste?			

Page 2 of 5

How?

- Self-certification period scheduled to open September 1, 2013
- CDPHE will notify you when the self-certification period is open
- More info to come...

SOME KEY DECISIONS



- ❑ Will you sort RCRA hazardous from non-RCRA hazardous?
- ❑ How will you keep track of the amount of waste you generate?
- ❑ How will you make your hazardous waste determinations?

TO SORT OR NOT TO SORT?



SORTING

- ❑ Lowers transportation and disposal costs
- ❑ Requires training and staff time
- ❑ Highly prone to error

NOT SORTING

- ❑ Increases transportation and disposal costs
- ❑ Lessens risk of improper disposal due to sorting errors

OTHER POTENTIAL LTCF WASTES REQUIRING SPECIAL MANAGEMENT



Waste cleaners or sanitizers



Used electronics



Sharps and infectious waste



Mercury-containing lighting
waste



Used batteries

SCHEDULE FOR LTCF OUTREACH AND COMPLIANCE



- **Now:** Generator Assistance Program (GAP) site visits available by request
- **June & August 2013:** Formal health care waste management training sessions
- **September 30, 2013:** Self-certification of proper disposal due